

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**IN RE:** §  
§  
**SKYPORT GLOBAL** §                   **CASE NO. 08-36737-H4-11**  
**COMMUNICATIONS, INC.,** §  
§  
**DEBTOR**                                 §                   **Chapter 11**

**REQUEST FOR EXPEDITED CONSIDERATION**

SKYPORT GLOBAL COMMUNICATIONS, INC. ("Debtor" or "SkyPort"), debtor and debtor-in-possession in this case hereby requests consideration of its Expedited Motion for an Order 1) Pursuant to Section 107(b) of the Bankruptcy Code and Bankruptcy Rule 9018 for Leave to Place Document under Seal or for 2) Determination that Contract Cannot be Sealed ("Motion") and in support thereof would respectfully show the Court as follows:

1. As stated in the Motion, on January 19 2008, the Debtor filed a motion for Court approval of a Network Services Agreement with EchoStar under 11 U.S.C. 363 and attached the EchoStar contract as Exhibit "A" (Docket #77).

2. The EchoStar contract requires that it 1) must be approved by the Bankruptcy Court; 2) may have the material terms disclosed in summary fashion and; 3) but that the agreement itself must be filed under seal, if at all. The EchoStar contract was not filed under seal when the Debtor filed it and sought court approval.

3. The Debtor does not want to be in material breach of the agreement because of the failure of the condition to file it under seal. The Debtor now seeks an order either for leave to place the EchoStar contact under seal or for determination by this Court that the EchoStar contact cannot be sealed.

4. Expedited consideration is requested because the Debtor has already mailed the contract to creditors and if the Motion is not considered in short order, the relief sought in the Motion will be moot or impossible to render.

5. Attached is the Declaration of Edward L. Rothberg certifying that the foregoing expedited relief is required.

WHEREFORE, SkyPort prays that the Court consider the Motion on an expedited basis and grant such other and further relief as is just and proper.

DATED: January 22, 2009

Respectfully submitted,

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Edward L. Rothberg  
EDWARD L. ROTHBERG  
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ATTORNEYS FOR DEBTOR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served via electronic mail, and/or U.S. first class mail, postage prepaid, on January 22, 2009, to the parties on the attached service list:

/s/ Edward L. Rothberg  
EDWARD L. ROTHBERG

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**DECLARATION UNDER 28 U.S.C. §1746**

I, Edward L. Rothberg, attorney for the Debtor, SkyPort Global Communications, Inc., declare under penalty of perjury as follows:

1. My name is Edward L. Rothberg. I am the attorney for the Debtor, SkyPort Global Communications, Inc., in this Chapter 11 case.
2. I have read the foregoing REQUEST FOR EXPEDITED CONSIDERATION, and all of the facts stated therein are true and correct.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on January 22, 2009

/s/ *Edward L. Rothberg*  
EDWARD L. ROTHBERG